

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Lisa Nguyen

Debtor

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Case No: 18-16367

Chapter 13

**OBJECTION OF MOTION TO DISMISS**

Lisa Nguyen, debtor in the above-captioned case (the “Debtor”), through her undersigned counsel, Gerald R. Clarke, Esquire, hereby objects to Motion to Dismiss filed by the chapter 13 standing trustee in the matter captioned above for the following reasons:

1. The Debtor has made total payments of \$62,409.33 out of total approved plan payments of \$64,984.70;
2. Accordingly, the Debtor has satisfied 96% of the approved plan.
3. Payments of \$2575.37 are outstanding as of the filing of this Objection.
4. Financial circumstances have created a hardship for the Debtor making full plan monthly payments of \$784.14.
5. The Debtor will commence making \$300 monthly payments effective with the August 2024 payments.
6. The plan shall be paid in full as follows: \$300 monthly payments between August 2024 and March 2025 and a final payment of 175.37 in April 2025.

WHEREFORE, the Debtor respectfully requests that the Court enter an order in the form annexed hereto, denying the Motion of the chapter 13 standing trustee.

Dated: July 19, 2024

/s/ Gerald R. Clarke

Gerald R. Clarke

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In re: Lisa Nguyen

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Case No: 18-16367

Chapter 13

**ORDER DENYING MOTION TO DISMISS  
OF CHAPTER 13 STANDING TRUSTEE**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, upon consideration of the Motion to Dismiss filed by the Chapter 13 Standing Trustee, said motion is denied.

BY THE COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon.  
Bankruptcy Judge

Cc: Debtor  
Counsel for Debtors  
Office of the U.S. Trustee  
Standing Chapter 13 Trustee  
Creditors